

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SAMIRA SIERRA, AMALI SIERRA,
RICARDO NIGAGLIONI, and ALEX GUTIERREZ,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

CITY OF NEW YORK, a municipal entity;
BILL DE BLASIO, in his individual capacity;
DERMOT F. SHEA, in his individual capacity;
TERENCE A. MONAHAN, in his individual capacity;
UMID KARIMOV, in his individual capacity;
ALFREDO JEFF, in his individual capacity;
DEBORA MATIAS, in her individual capacity; and
ANDRE JEANPIERRE, in his individual capacity,
KENNETH C. LEHR, in his individual capacity,

Defendants.

20 Civ 10291 (CM)(GWG)

**DECLARATION OF
ROB RICKNER IN SUPPORT
OF PLAINTIFFS' MOTION
TO FILE AN AMENDED AND
CONSOLIDATED
COMPLAINT**

ROB RICKNER, an attorney duly admitted to practice before this Court, declares under penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am an attorney for the plaintiffs in the above-captioned matter, and I am familiar with the facts of this case,

2. I submit this declaration in support of Plaintiffs' motion for leave to file an amended complaint consolidating the *Sierra* and *Wood* cases.

3. Attached hereto are true and correct copies of the following documents:

Exhibit 1: Proposed Consolidated and Amended Complaint

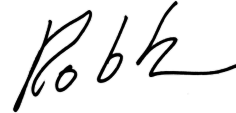
Exhibit 2: Recording of NYPD radio transmissions at Mott Haven from approximately 7:20 p.m. to 8:40 p.m. on June 4, 2020

Exhibit 3: Maps showing the direction of the Mott Haven march, police operations, and the mass arrest location

- Exhibit 4: Excerpts of transcript prepared by Department of Investigations of Kenneth Lehr's testimony to DOI (page numbers were added to the exhibit).
- Exhibit 5: April 11, 2022, 1:56 p.m. email from Senior Counsel Daniel M. Braun
- Exhibit 6: PO Antony Stevens body-worn camera video from June 4, 2020
- Exhibit 7: Citizen video of mass arrest on East 136th Street at June 4, 2020, taken from Millbrook Houses
- Exhibit 8: NYPD TARU video
(Bates DEF_VID_000000427)
- Exhibit 9: Video from within kettle, June 4, 2020
(Bates 202004301_Video_202004301_20200630_1152)
- Exhibit 10: Video from within kettle, June 4, 2020
(Bates 202004301_Video_202004301_20200825_1400)
- Exhibit 11: FTP 4 PROTEST PLAN THURSDAY 6/4/20 40PCTHUB (Bates DEF_E_PD_00095629 to DEF_E_PD_0009563)
- Exhibit 12: BRONX DEPLOYMENT 6/4/2020 (Bates DEF_E_PD_00095953 to DEF_E_PD_00095954)
- Exhibit 13: Audio recording of testimony of Chief of Department Terrence Monahan to CCRB
- Exhibit 14: Defendants' Responses and Objections to Plaintiffs' Third Set of Supplemental Discovery Requests
- Exhibit 15: February 23, 2022 letter from Michael L. Spiegel to A.C.C. Dara Weiss
- Exhibit 16: April 7, 2022 email from Jenny Weng to Joshua S. Moskovitz
- Exhibit 17: Aided reports by Chief Robert Lukach and Inspector Ronald Zedalis
(Bates DEF_000346956 to DEF_000346959)

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: July 21, 2022

A handwritten signature in black ink, appearing to read "Rob Rickner", written in a cursive style.

Rob Rickner